

**Glenn S. Bacal** (AZ Bar No. 006812)

E-mail: [glenn.bacal@bacalgroup.com](mailto:glenn.bacal@bacalgroup.com)

**Sean D. Garrison** (AZ Bar No. 014436)

E-mail: [sean.garrison@bacalgroup.com](mailto:sean.garrison@bacalgroup.com)

**BACAL LAW GROUP, P.C.**

**D/B/A/ BACAL & GARRISON LAW GROUP**

6991 East Camelback Road, Suite D-102

Scottsdale, Arizona 85251

Telephone: (480) 245-6230

Fax: (480) 245-6231

OF COUNSEL:

**Brian W. Brokate** (admitted pro hac vice)

E-mail: [bwbrokate@gibney.com](mailto:bwbrokate@gibney.com)

**Beth M. Frenchman** (admitted pro hac vice)

E-mail: [bfrenchman@gibney.com](mailto:bfrenchman@gibney.com)

**Maja Szumarska** (admitted pro hac vice)

E-mail: [mszumarska@gibney.com](mailto:mszumarska@gibney.com)

**GIBNEY ANTHONY & FLAHERTY, LLP**

665 Fifth Avenue

New York, New York 10022

Telephone: (212) 688-5151

Fax: (212) 688-8315

*Attorneys for Plaintiff*

*Rolex Watch U.S.A., Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

Rolex Watch U.S.A., Inc.

Plaintiff,

vs.

Vintage Watchmaker LLC and Jensen  
Dinh,

Defendants.

Civil Action No. 2:18-cv-02308-SPL

**Notice of Settlement**

Pursuant to LR Civ 40.2(d), Plaintiff Rolex Watch U.S.A., Inc. (“Rolex” or “Plaintiff”) notifies the Court that the parties have reached a settlement and are in

1 process of executing the agreement. Once the agreement has been fully executed, the  
2 parties will file a stipulated consent judgment to conclude this matter.

3 RESPECTFULLY SUBMITTED this 12<sup>th</sup> day of November, 2018.  
4

5 By /s/ Sean D. Garrison

6 Glenn S. Bacal (AZ Bar No. 006812)  
7 Sean D. Garrison (AZ Bar No. 014436)  
8 BACAL LAW GROUP, P.C.  
9 D/B/A/ BACAL & GARRISON LAW GROUP  
10 E-mail: [glenn.bacal@bacalgroup.com](mailto:glenn.bacal@bacalgroup.com)  
11 E-mail: [sean.garrison@bacalgroup.com](mailto:sean.garrison@bacalgroup.com)  
12 6991 East Camelback Road, Suite D-102  
Scottsdale, Arizona 85251  
Telephone: (480) 245-6230  
Fax: (480) 245-6231

13 GIBNEY ANTHONY & FLAHERTY, LLP  
14 Brian W. Brokate (admitted pro hac vice)  
Beth M. Frenchman (admitted pro hac vice)  
Maja Szumarska (admitted pro hac vice)

15 *Attorneys for Plaintiff*  
16 *Rolex Watch U.S.A., Inc.*  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on November 12, 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and for transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Paul D. Ticen  
Paul Ticen Law  
3195 S. Price Road, Suite 148  
Chandler, Arizona 85248  
Tel: 480-646-9382  
Fax: (480) 420-3825  
[paul@paulticenlaw.com](mailto:paul@paulticenlaw.com)

*Attorney for Defendants Vintage Watchmaker LLC and Jensen Dinh*

/s/Sean D. Garrison